

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Georgann Kathleen Sevec)
Plaintiff,) Case No. 1:19-cv-07278
v.) Hon. Young B. Kim
Commissioner of Social Security,)
Defendants.)

**PLAINTIFF GEORGANN SEVEC'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR
SUMMARY JUDGMENT AND TO DIRECT THE CLERK TO PROVIDE A COPY OF
THE OPERATIVE COMPLAINT TO COUNSEL**

Plaintiff Georgann Sevec ("Sevec") respectfully moves for an extension of time to file its Motion for Summary Judgment, and related relief. The Government has indicated it does not oppose the relief requested by Plaintiff's motion. In support of this motion, Plaintiff states as follows:

1. Plaintiff filed, *pro se*, the complaint that initiated this proceeding on November 4, 2019. Dkt. 1.
2. On January 25, 2021, Plaintiff filed an Amended Complaint, also *pro se*. Dkt. 21.
3. On January 27, 2021, the Court entered an order sealing the Amended Complaint because it contained Plaintiff's medical information. Dkt. 22.
4. On June 3, 2021, Jenner & Block, LLP attorney Randall E. Mehrberg was appointed counsel on behalf of Plaintiff. Dkt. 29.

5. On June 16, 2021, the Court set the date for Plaintiff's motion for summary judgement as August 20, 2021. Dkt. 30. The deadline for the government's response and/or cross-motion was set for October 22, 2021. *Id.*

6. Plaintiff's counsel has diligently reviewed the administrative record in this matter but cannot file a motion for summary judgment without access to a copy of the Plaintiff's operative complaint.

7. Plaintiff's appointed counsel has not been able to obtain a copy of the complaint in this matter because the complaint is under seal on the Court's docket.

8. Plaintiff's counsel also requested a copy of the Complaint from Plaintiff, and it appears that Plaintiff did not retain a copy for her records.

9. Plaintiff's counsel also needs to review the complaint to evaluate whether to seek amendment given the issues identified by counsel in their review of the administrative record.

10. Accordingly, Plaintiff's counsel requests access to the unsealed complaint.

11. In addition, Plaintiff requests that the Court permit Plaintiff 30 days from the date that Plaintiff counsel obtains a copy of the unsealed complaint to either (i) amend the complaint; or (ii) file Plaintiff's motion for summary judgement.

12. This is Plaintiff's first request for an extension of time since Plaintiff's counsel was appointed in this matter.

13. Counsel for Plaintiff has discussed this motion with Assistant U.S. Attorney Jonathan Haile, and the government has no objection to this motion.

14. Granting this request for an extension of time will neither prejudice any party nor unreasonably delay litigation.

WHEREFORE, for the reasons stated herein, Plaintiff respectfully requests that the Court grant this motion and (i) direct the Clerk of Court for the United States District Court for the Northern District of Illinois to provide a copy of the Amended Complaint (Dkt. 21) to Plaintiff's counsel, and (ii) permit Plaintiff 30 days from the date that Plaintiff's counsel obtains a copy of these materials to either amend the complaint or to file Plaintiff's motion for summary judgment.

Dated: August 16, 2021

Respectfully Submitted,

By: /s/ Jason Bradford

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Attorneys for Georgann Sevec

CERTIFICATE OF SERVICE

I, Jason Bradford, an attorney, certify that on this 16th day of August, 2021, I caused a copy of the foregoing ***Plaintiff Georgeann Sevec's Unopposed Motion for Extension of Time to File Motion for Summary Judgment and Related Relief*** to be filed with the electronic filing system of the Northern District of Illinois, which will automatically serve all counsel of record.

/s/ Jason Bradford
Attorney for Defendant